## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

SEANTELL D. CRENSHAW,	)	
Plaintiff,	)	
v.	)	Case No. 2:06cv276-WKW
KELLY AEROSPACE POWER SYSTEM INC.,	MS,)	2:00CV2/0-VVKVV
Defendant.	)	

#### JOINT MOTION FOR ENTRY OF QUALIFIED HIPAA PROTECTIVE ORDER

Plaintiff, Seantell D. Crenshaw, and Defendant, Kelly Aerospace Power Systems, Inc., respectfully move this Honorable Court to enter the Qualified HIPAA Protective Order attached hereto as Exhibit "A" to govern the production and protection of certain Protected Health Information ("PHI") so that the parties, and any third party receiving any subpoena, may comply with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Both parties believe that the order will provide for the efficient production of documents and compliance with HIPAA.

Respectfully submitted this 2nd day of November, 2006.

s/ Kelly F. Pate

One of the attorneys for Defendant, Kelly Aerospace Power Systems, Inc.

#### **OF COUNSEL:**

Charles B. Paterson (PAT018) Kelly F. Pate (FIT014) BALCH & BINGHAM LLP 105 Tallapoosa Street, Suite 200 Montgomery, AL 36104-2549 Telephone: (334) 834-6500 Facsimile: (866) 736-3857 E-mail: cpaterson@balch.com E-mail: kpate@balch.com

Alan M. Rauss (Bar No. 0000888) KOHRMAN JACKSON & KRANTZ One Cleveland Center, 20<sup>th</sup> Floor

Cleveland, Ohio 44114 Telephone: (216)696-8700 Facsimile: (216)621-6536 E-mail: amr@kjk.com

### s/ Carol Gerard

One of the Attorneys for Plaintiff, Seantell D. Crenshaw

# **OF COUNSEL:**

Law Offices of Jay Lewis, LLC Jay Lewis (LEW031) Carol Gerard (GER016) P.O. Box 5059 Montgomery, Alabama 36103-5059

173449.1